

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LAURA E. PATRICK,
Plaintiff,

vs.

JANSSON CORPORATION,
Defendant

CIVIL ACTION NO.:04-10427RGS

JOINT STATEMENT FOR LOCAL RULE 16.1 CONFERENCE

1. DISCOVERY PLAN

The parties propose the following discovery plan:

- A. On or before July 1, 2004: Exchange of documents automatically disclosed.
- B. On or before September 1, 2004: Interrogatories and document requests served.
- C. On or before October 15, 2004: Responses to Interrogatories and document requests due, with documents to be produced by November 1, 2004.
- D. On or before December 31, 2004: Depositions of parties and fact witnesses completed and related supplemental documents requests, if any, issued.
- E. On or before January 30, 2005: Expert witness depositions (if any) and requests for admissions served.

II. PROPOSED SCHEDULE FOR FILING OF MOTIONS

- A. Dispositive motions to be filed by February 1, 2005; and
- B. Replies to be filed by March 15, 2005.

III. PRETRIAL CONFERENCE

Parties expect that the case will be ready for a final pretrial conference in April 1, 2005.

IV. CERTIFICATION OF COUNSEL AND PARTIES

Certifications are forthcoming.

V. OTHER MATTERS


The Plaintiff has consented to trial by a Magistrate Judge. The Defendant has not. The parties are aware of no other agenda items that must be discussed at the Rule 16.1 conference other than those described above.

Respectfully submitted,

Jannson Corporation
By its Attorney,

Laura Patrick
By her Attorney,


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